

**Appendix 2**  
**City NOI for MS4 Program (dated October 14, 2003) and**  
**MDE's NOI Review**



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

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Robert L. Ehrlich, Jr., Governor  
Michael S. Steele, Lt. Governor

Kendl P. Philbrick, Acting Secretary

October 14, 2003

Ms. Margaret B. Martin  
City of Annapolis  
160 Duke of Gloucester Room 204  
Annapolis MD 21401

Dear Ms. Martin:

*Margaret*  
The Maryland Department of the Environment, Water Management Administration (MDE\WMA) has completed a review of the City of Annapolis's Notice of Intent (NOI) for coverage under General Permit No. 03-IM-5500 for Discharges from Small Municipal Separate Storm Sewer Systems. Annapolis submitted this NOI with information regarding how it intends to complete each of the six minimum control measures. Attached is a summary of your NOI and recommendations for additional information that will need to be submitted in the annual report.

Overall, the NOI is considered to be complete, satisfies the NPDES Phase II application requirements, and constitutes coverage under the general permit. Information provided regarding public education and outreach, public participation, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control, and pollution prevention/good housekeeping were adequate.

MDE would like to thank the City of Annapolis for its submittal of a complete NOI. The submittal of an annual report is required by the regulations on the anniversary date of general permit adoption. As a result, Annapolis will need to submit an annual report on June 13, 2004 that addresses the information highlighted above and describes overall program implementation. If you have any questions or comments, please call me or Mr. Buddy Page at 410-537-3543.

Sincerely,

*[Signature]*  
L. Kenneth Pensyl, Program Administrator  
Sediment, Stormwater, and Dam Safety Program  
Water Management Administration

cc: Mr. Joseph A. Baker, Jr., City of Annapolis  
Mr. Darryl T. Hockstra, Anne Arundel County Department of Public Works

**National Pollutant Discharge Elimination System (NPDES) General Permit  
Discharges from Small Municipal Separate Storm Sewer Systems**

**NOTICE OF INTENT (NOI) REVIEW**

**2003 Review for the City of Annapolis**

The following information was provided by the City of Annapolis in its NOI. In its annual report due on June 13, 2004, progress toward meeting all proposed activities should be described.

**Public Education and Outreach.** The City currently participates in several celebrations including Earth Day and National Arbor Day to educate citizens regarding environmental issues. A stormwater webpage has been established, children will help with stream restoration and clean-up through the Chesapeake Children's Museum, and bi-lingual brochures will be distributed. Citizens are also encouraged to participate in Greenscape where the City provides plants, trees, and mulch. Future activities will include planting underwater redhead grasses which are currently being prepared and 1000 tree seedlings in the Back Creek watershed in 2004 through the Annapolis Tree Committee. Implementing these activities will satisfy this minimum control measure. In its annual report, the City should provide examples of brochures and examples of educational activities during various celebration days.

**Public Participation** The City's public participation activities consist of three main components: stream monitoring, storm drain stenciling, and tree planting. This year, Annapolis will establish a monitoring program for schools and prepare storm drain stencils and associated guidelines. In the future, the City will recruit volunteer monitoring groups and homeowners associations, organize yearly field trips for the stenciling program, and have citizens and community organizations participate in tree planting. Implementing these activities will satisfy this minimum control measure. In its annual report, the City should provide updates regarding its storm drain stenciling program, stream monitoring participation, and tree planting results.

**Illicit Discharge Detection and Elimination** Annapolis will complete a map of its storm drain system and prepare an outfall inventory. Future efforts will include outfall screening beginning with major outfalls, recruiting volunteer groups for screening through the "Adopt a Creek" program, and preparing a brochure on pollution prevention practices. For its map, the City should include storm drain system features such as outfalls, inlets, pipes, and their respective attributes in geographic information system (GIS) format. In addition, the City needs to identify potential hot spots for illicit connections such as industrial or commercial areas and develop inspection and enforcement procedures. MDE encourages the City to work with Anne Arundel County with its illicit discharge program. Recent discussions with Phase I NPDES jurisdictions have found that current field screening activities may not always be adequate for illicit connection detection and elimination. In its annual report, the City should provide a copy of its storm drain system map and results of initial outfalls screening activities.

**Construction Site Runoff Control** The Maryland Department of the Environment (MDE) inspects and enforces erosion and sediment control at construction sites within the City. However, in August 2003, the City requested an application for delegation of erosion and sediment control enforcement authority from MDE. In this request, Annapolis indicated that over the next several months it intends to hire staff and modify regulations and ordinances to acquire delegation. In the meantime, the City will continue to rely on MDE to implement this requirement as a "qualifying local program" as defined in the general permit. As a result, this minimum control measure has been satisfied.

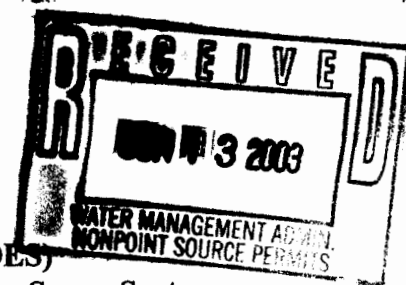
**Post-construction Runoff Control** The City currently administers a stormwater management program that meets State law. Annapolis will inventory all stormwater management facilities and inspect each annually. In addition, a system to enforce replacement or repair of failing systems will be established. Implementing the City's stormwater management program will satisfy this minimum control measure. The City should be reminded that reporting and documenting stormwater management activities become more important under the Phase II NPDES program. Historically, State law required that activities such as inspections performed, enforcement used, and maintenance be documented. Under the NPDES requirements, these activities potentially face additional scrutiny. In its annual report, the City should describe progress with its inspection and enforcement activities.

**Pollution Prevention and Good Housekeeping** Annapolis will inventory and map all municipal properties, develop inspection schedules and target pollutants at each facility, and educate City employees. Future efforts will include improving stream buffers around municipal facilities. Implementing these activities will satisfy this minimum control measure. In its annual report, the City should provide a copy of the map and inventory of facilities and potential pollutants. In addition, the City should consider developing, if it does not already exist, a street sweeping program.

Maryland Department of the Environment (MDE)  
Water Management Administration (WMA)

NOTICE OF INTENT

National Pollutant Discharge Elimination System (NPDES)  
General Permit for Discharges from Small Municipal Separate Storm Sewer Systems



This Notice of Intent (NOI) form is intended for those jurisdictions seeking coverage under General Discharge Permit No. 03-IM-5500. Submitting this application constitutes notice that the entity identified below agrees to comply with all terms and conditions of the general permit. This NOI, and all subsequent information shall be submitted to:

Maryland Department of the Environment, Water Management Administration  
Nonpoint Source Program, FL 4, STE 440  
1800 Washington Boulevard, Baltimore, MD 21230-1708  
Phone: 410-537-3543 FAX: 410-537-3553  
Web Site: [www.mde.state.md.us](http://www.mde.state.md.us)

**1. Contact Information**

Jurisdiction Name: CITY OF ANNAPOLIS Contact Person(s): MARGARET B. MARTIN  
Mailing Address: 160 DUKE OF GLOUCESTER  
ROOM : 204  
Phone Number: (410) 263-7949 FAX Number: (410) 263-3322  
Email address: ALL-PNE & C @ ANNAPOLIS . GOV

**2. Minimum Control Measures**

Part II. B. of the General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (No. 03-IM-5500) specifies the information that needs to be submitted to MDE by localities. This information includes the best management practices (BMP) to be used, measurable goals, and a schedule for implementation for each of the following six minimum control measures. Additionally, municipalities seeking coverage under this general permit shall report the responsible entity that will implement each measure (e.g., local, County, State, etc.) and a fiscal analysis for meeting compliance. Details regarding the required information can be found in Attachment A. Guidance. A table for jurisdictions to provide information regarding the types of BMPs proposed to be implemented is located on the next page. Localities can attach additional information if necessary.

**3. Signature of Contact Person**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this NOI and all attachments. I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Joseph A. Baker Jr. Joseph A Baker Jr. JUNE/12/03  
Printed Name Signature Date

## **NOI**

### **PUBLIC EDUCATION AND OUTREACH :**

- 1- Exposition : Organize exposition to provide interaction between DPW and the citizens of the City.
- 2- Earth Day Booth : The Annapolis Environmental Commission participates in a booth for that day.
- 3- National Arbor Day : The City coordinates National Arbor Day with community groups and schools.
- 4- Chesapeake Children's Museum : The Museum will provide stream restoration with the help of volunteer children.
- 5- Annapolis Tree Committee : This Committee has been formed to coordinate neighborhood greening projects. In 2004 a total of 1000 seedlings will be planted in Back Creek watershed.
- 6- Wade In : This program is directed at increasing the awareness of the necessity for better water quality, and shoreline habitat.
- 7- Storm Water Web Page : The City has provided a Web Page for Environmental issues and separate pages for the Educational and the Public Participation programs. Logs of volunteer activities are included in the Public Participation page and this page is updated constantly.
- 8- Brochures : Brochures in English and Spanish have been printed out. The brochures cover Storm water issues, Recycling, Industrial Waste, Shoreline and Native Habitat protection. Local contact numbers have been included in these brochures as well as on the web pages for reporting any problems.
- 9- Bioretentions and Raingardens : Several sites are being studied for possible Raingardens. By 2004 the City will have the first group installed and in the following years, the City will monitor those installed and continue installing new raingardens at a rate of two a year.
- 10- Underwater Bay Grasses: The City along with other volunteer groups in the City, are growing underwater redhead grasses to be planted later in the summer of 2003.
- 11- Greenscape: Annual project where Annapolis residents are encouraged to participate in community cleanup, planting, and beautification. The City provided plants, trees, and mulch as well as the supporting staff.

## **PUBLIC INVOLVEMENT AND PARTICIPATION :**

### **1- Stream Monitoring:**

- 2003 Establish Monitoring Program group recruited from schools.
- 2004 Develop a Web site with photo gallery for Monitoring groups participating.
- 2005 Establish volunteer Monitoring groups from Homeowners Associations and citizens.
- 2006 Cover all schools and community organizations.
- 2007 Develop a program including summer camp programs.
- 2008 Develop a setup for a continuous monitoring program for the years to come.

### **2- Storm Drain Stenciling:**

- 2003 Prepare Stencils and necessary material for the program and put the guidelines.
- 2004 Reach out to Citizens and Homeowners Associations.
- 2005 Reach out to schools and schedule yearly field trips for Stenciling program.
- 2006 Complete coverage of all schools and community organizations.
- 2007 Develop a summer program to provide a year round coverage of the program.
- 2008 Develop a system of continuous stenciling and repairing of fading images.

### **3- Tree Planting:**

- 2003 Start the tree planting program by planting 1000 trees.
- 2004 Recruit further groups from community organizations and set up milestones.
- 2005 Achieve the milestone set up, and reach out all volunteer groups in the City.
- 2006 Develop a plan to coordinate efforts of various groups.
- 2007 Implement the coordination plan.
- 2008 Develop a self sustained system of continuous tree planting by the volunteer groups.

## **ILLCIT DISCHARGE DETECTION AND ELIMINATION:**

### **1- Create a map:**

- 2003 Complete a map of the City.
- 2004 Check data in preparation for watershed study by carrying out a survey.
- 2005 Start a comprehensive watershed study..
- 2006-2008 Continue watershed study and keep updating the maps as necessary.

### **2- Adopt a Creek:**

- 2003 Establish a program and provide a page on the City web site.
- 2004 Recruit volunteer groups for the program- through Home owners associations.
- 2005 Involve schools and community organizations, and encourage day trips.
- 2006 Expand the program to include summer activities.
- 2007-2008 Follow up on all volunteer groups.

### **3- Inspection of Outfalls:**

- 2003 Prepare a list of all outfalls.
- 2004 Build up an inspection system starting with Major outfalls, and start inspections.
- 2005 Prepare a brochure on pollution and best managements practices to be implemented,  
And distribute these brochures to all City employees and the general public.
- 2006-2008 Continue with the inspection .



**CONSTRUCTION SITE RUNOFF CONTROLS :**

This BMP is enforced by MDE, as per state law.

## **POST CONSTRUCTION STORMWATER MANAGEMENT :**

### **Post Construction runoff control:**

- 2003 Stormwater management ordinance in effect.
- 2004 Complete list of all storm water management in a prioritized order.
- 2005 Prepare a team to inspect existing SWM facilities, and continue approving and inspecting the new ones.
- 2006 Establish a system which will provide a yearly inspection of every SWM facility in the City.
- 2007 Establish a system to enforce replacement or repair of failing systems.
- 2008 Continue the inspection and enforcement policies.

## **POLLUTION PREVENTION AND GOOD HOUSEKEEPING :**

- 2003 Prepare a list of all Municipal properties, with maps of each site.
- 2004 Establish a training program for City Employees.
- 2005 Prepare an inventory of pollutant sources and provide an inspection schedule for each site.
- 2006 Increase vegetative buffers around streams on Municipal properties.
- 2007-2008 Continue all three measures namely Training program, pollutant sources inspection, and increase vegetative buffers.